

Message

From: Knorr, Michele [knorr.michele@epa.gov]
Sent: 7/25/2019 1:09:15 PM
To: Garrison, Scott [Garrison.Scott@epa.gov]; Perlis, Robert [Perlis.Robert@epa.gov]
CC: Koch, Erin [Koch.Erin@epa.gov]
Subject: RE: Request for public comment on interpretation of FIFRA
Attachments: SLN Document for Comment 7-18-19.bp comments.sbg MLK.docx

Here are my additional edits. I'm not quite sure I understand the process here for what they are actually asking for comment, but I guess that is for the Bo call.

Michele L. Knorr, Attorney
Pesticides and Toxic Substances Law Office
Office of General Counsel
202-564-5631

From: Garrison, Scott
Sent: Wednesday, July 24, 2019 4:29 PM
To: Perlis, Robert <Perlis.Robert@epa.gov>
Cc: Koch, Erin <Koch.Erin@epa.gov>; Knorr, Michele <knorr.michele@epa.gov>
Subject: RE: Request for public comment on interpretation of FIFRA

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I generally agree with all your comments and I've revised the text accordingly. Erin & Michele, let me know if you have any feedback.

Scott Garrison
Pesticides and Toxic Substances Law Office (2333A)
Office of General Counsel
U.S. Environmental Protection Agency
202-564-4047
garrison.scott@epa.gov

From: Perlis, Robert
Sent: Wednesday, July 24, 2019 2:56 PM
To: Garrison, Scott <Garrison.Scott@epa.gov>
Cc: Koch, Erin <Koch.Erin@epa.gov>; Knorr, Michele <knorr.michele@epa.gov>
Subject: RE: Request for public comment on interpretation of FIFRA

Ex. 5 Deliberative Process (DP) / Attorney-Client

Bob Perlis
Pesticides and Toxic Substances Law Office

Office of General Counsel
US EPA
(202) 564-5636

From: Garrison, Scott
Sent: Wednesday, July 24, 2019 11:16 AM
To: Perlis, Robert <Perlis.Robert@epa.gov>
Cc: Koch, Erin <Koch.Erin@epa.gov>; Knorr, Michele <knorr.michele@epa.gov>
Subject: Request for public comment on interpretation of FIFRA

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Bob, I guess it is time to get you involved in this. Apparently Alex wants to seek public comment on whether EPA should start rejecting more restrictive 24(c)'s.

Ex. 5 Deliberative Process (DP) / Attorney-Client

Scott Garrison
Pesticides and Toxic Substances Law Office (2333A)
Office of General Counsel
U.S. Environmental Protection Agency
202-564-4047
garrison.scott@epa.gov

From: Garrison, Scott
Sent: Wednesday, July 24, 2019 11:14 AM
To: Knorr, Michele <Knorr.Michele@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>
Subject: RE: 24(c) Comment Document

Confidential communication for internal deliberations only. Attorney-client privilege. Do not distribute outside EPA.

Ex. 5 Deliberative Process (DP) / Attorney-Client

Scott Garrison
Pesticides and Toxic Substances Law Office (2333A)
Office of General Counsel
U.S. Environmental Protection Agency
202-564-4047

From: Knorr, Michele

Sent: Wednesday, July 24, 2019 9:55 AM

To: Koch, Erin <Koch.Erin@epa.gov>; Garrison, Scott <Garrison.Scott@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>

Subject: RE: 24(c) Comment Document

Ex. 5 AC/DP

Michele L. Knorr, Attorney
Pesticides and Toxic Substances Law Office
Office of General Counsel
202-564-5631

From: Koch, Erin

Sent: Wednesday, July 24, 2019 9:52 AM

To: Garrison, Scott <Garrison.Scott@epa.gov>; Davis, Kable <Davis.Kable@epa.gov>

Cc: Knorr, Michele <knorr.michele@epa.gov>

Subject: RE: 24(c) Comment Document

My understanding was that Alex requested the issue be put out for comment. Michele, were you at that meeting?

From: Garrison, Scott

Sent: Tuesday, July 23, 2019 4:22 PM

To: Davis, Kable <Davis.Kable@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>

Subject: RE: 24(c) Comment Document

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Ex. 5 Deliberative Process (DP) / Attorney-Client

Ex. 5 Deliberative Process (DP) / Attorney-Client

Scott Garrison
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From: Davis, Kable
Sent: Thursday, July 18, 2019 2:26 PM
To: Garrison, Scott <Garrison.Scott@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>
Subject: RE: 24(c) Comment Document

Hi Scott –

Thanks again for looking the document over. Here is a revised version that addresses your comments.

Enjoy the day.
Bo

Kable Bo Davis; Branch Chief
Minor Use & Emergency Response Branch
(703) 306-0415
davis.kable@epa.gov

From: Garrison, Scott
Sent: Wednesday, July 17, 2019 3:33 PM
To: Davis, Kable <Davis.Kable@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>
Subject: RE: 24(c) Comment Document

Confidential communication for internal deliberations only. Attorney-client privilege. Do not distribute outside EPA.

Hi Bo, my comments are attached...

Scott Garrison
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From: Davis, Kable
Sent: Monday, July 15, 2019 10:45 AM

To: Garrison, Scott <Garrison.Scott@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>

Subject: 24(c) Comment Document

Hi Erin and Scott –

I hope you both had a great weekend. Please find attached a revised 24(c) comment document, which is basically a complete rewrite. The document is much shorter, since it only discusses the topic of 24(c) registrations being more restrictive than the federal registration. I have a few comments:

1. Erin already looked this over (only briefly) and I made what few changes she had (added examples and discussed enforcement implications). I had mentioned that she would also have formatting comments, therefore I won't be surprised when I get comments.
2. Mike Goodis and already looked this over and I have incorporated his comments as well.
3. Mike and Rick discussed this new format and Rick was fine with it being much more streamlined.
4. Rick wants this to be passed along to Alex by the end of the month, which means we don't have a lot of time (so sorry about that). The good news is that it's only 3 pages.

I appreciate your help.

Bo

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